

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RHONDA STEEN,

Plaintiff,

V.

LIFE INSURANCE COMPANY OF NORTH AMERICA, THE UNITED STATES LIFE INSURANCE COMPANY IN THE CITY OF NEW YORK, and AMERICAN INTERNATIONAL GROUP, INC. also known as AIG AMERICAN GENERAL,

Defendants.

Case No. 08 CV 4181

Judge Andersen
Magistrate Judge Ashman

**AGREED MOTION OF DEFENDANTS FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING**

Defendants Life Insurance Company of North America, The United States Life Insurance Company in the City of New York, and American International Group, Inc. also known as AIG American General (collectively “Defendants”), by their undersigned counsel, move pursuant to Fed.R.Cvi.P. 6(b) for an enlargement of time to and including August 29, 2008 in which to file their responsive pleadings to Plaintiff’s Complaint, and in support thereof state as follows:

1. On July 23, 2008, Defendants removed this cause from the Circuit Court of Cook County, Illinois, to this Court. (Doc. #1.)
2. Defendants' responsive pleading to Plaintiff's Complaint presently is due July 30, 2008. Fed.R.Civ.P. 81(c); 6(a). Counsel for Defendants, however, is continuing its investigation of the allegations contained in the Complaint and gathering documents relevant to the Complaint, but requires an additional 30 days to file the responsive pleadings to Plaintiff's Complaint.

3. On July 23, 2008, one of the attorneys for Defendants, Jason M. Kuzniar, conferred with counsel for Plaintiff, Donald L. Bertelle, and Mr. Bertelle has no objection to the relief requested herein.

4. This is Defendants' first request for an extension of time and Plaintiff will not be prejudiced by the extension.

WHEREFORE, Defendants respectfully requests that the Court grant this Agreed Motion, giving Defendants to and including August 29, 2008 to file their responsive pleading to Plaintiff's Complaint, and award to Defendants such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

**Life Insurance Company of North America, The
United States Life Insurance Company in the
City of New York, and American International
Group, Inc. also known as AIG American
General, Defendants**

By: /s/ Jason M. Kuzniar
One of their attorneys

Daniel J. McMahon, Esq.
Jason M. Kuzniar, Esq.
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP
120 N. LaSalle St., Suite 2600
Chicago, IL 60602
Tel: 312-704-0550

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on the 30th day of July 2008, the above and foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and that a true and correct copy was served on the following by CM/ECF Electronic Notification:

Donald L. Bertelle, Esq.
(dlbertelle@sbcglobal.net)

/s/ Jason M. Kuzniar
Jason M. Kuzniar